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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL EXHIBITS TO  
THEIR TRIAL BRIEF**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal exhibits to their Trial Brief. Specifically, Defendants request an order granting leave to file under seal the following confidential documents:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 6	Entire Document	Plaintiff
Exhibit 7	Entire Document	Defendants Plaintiff
Exhibit 8	Entire Document	Plaintiff

The entirety of Exhibit 7 contains highly confidential information regarding Uber’s business strategy, internal market evaluations, potential cost models, future production estimates, and estimated development timelines. It also contains highly confidential information regarding third-party vendors with business agreements subject to NDAs, including pricing information. This information is not publicly known, and its confidentiality is strictly maintained. Disclosure of this information would give competitors knowledge into elements of Uber’s business strategy, financial estimates regarding various elements of Uber’s business, and confidential vendors. Uber’s competitive standing could be significantly harmed. (Declaration of Thomas J. Pardini in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Pardini Decl.”) ¶ 3.)

The entireties of Exhibits 6-8 contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” or “Confidential” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Pardini Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

1 Defendants served Waymo with this Administrative Motion to File Documents Under  
2 Seal on November 21, 2017.

3 For the foregoing reasons, Defendants request that the Court enter the accompanying  
4 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and  
5 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –  
6 ATTORNEYS' EYES ONLY."

7 Dated: November 21, 2017

MORRISON & FOERSTER LLP

8  
9 By: /s/ Arturo J. González  
ARTURO J. GONZÁLEZ

10 Attorneys for Defendants  
11 UBER TECHNOLOGIES, INC. and  
12 OTTOMOTTO LLC  
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